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Attorneys for Plaintiff Keith Murray

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KEITH MURRAY,

Plaintiff,

- against -

UNITED PARCEL SERVICE OF AMERICA, INC.,  
UNITED PARCEL SERVICE, INC., UNITED  
PARCEL SERVICE CO., THOMAS CLEARY and  
JILLIAN DEDIER,

Defendants.

**Index No. 08 CV 02160  
(LAK)(DFE)**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the annexed declaration of Adam Richards and the exhibits attached thereto, and the pleadings herein, Plaintiff Keith Murray, by his attorneys Adam Richards LLC, will move this Court before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, for an Order, (a) pursuant to Fed. R. Civ. P. 37 compelling Defendants United Parcel Service of America, Inc., United Parcel Service, Inc. and United Parcel Service Co. (collectively the “UPS Defendants”) to produce to Plaintiff the identity of a material witness designated by the UPS Defendants as a “Confidential Informant”; (b) pursuant to Fed. R. Civ. P. 37 (c) (1) awarding Plaintiff the costs of this motion including his reasonable attorneys fees; and (c) for such other and further relief as this Court deems just and proper.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
July 2, 2008

ADAM RICHARDS LLC

By: /s Adam Richards  
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